

MEMO ENDORSED

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March 23, 2021

Hon. William H. Pauley, III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Sunita Kumar*
Docket No.: 17-CR-703

Dear Judge Pauley:

I am retained counsel to defendant Sunita Kumar. I write to request that Ms. Kumar's conditions of release be modified to permit her to extend her trip to Delhi, India by two weeks.

On February 12, 2021, Your Honor was kind enough to modify Ms. Kumar's conditions of release to allow her to travel to India to visit her ailing mother. After a month-long wait to receive her visa from the Indian Consulate and to clear necessary COVID-19 travel protocols, Ms. Kumar was able to travel to Delhi in recent weeks.

Ms. Kumar is scheduled to return to New York at the end of this week, but is requesting permission to extend her trip for an additional two weeks to spend a little more time with her mother. Her mother remains in critical condition, and the plan is to transition her to hospice care when she leaves the hospital next week. Attached for the Court's review is a letter from her mother's doctor at the hospital describing her condition as of yesterday. (*See Exhibit A*). Ms. Kumar believes this will be the last chance she has to spend time with her mother before she passes away.

If permitted to remain in Delhi, Ms. Kumar will continue to stay at her family home, located at F-31 B, Laxmi Nagar, Delhi, India 110092. She will also remain in contact with her pretrial services officer through WhatsApp.

We have conferred with the government, by AUSA Christopher DiMase, who takes no position on this request. We have also spoken with Pretrial Services Officer Robert Long from the

Eastern District of New York, who supervises Ms. Kumar. After conferring with his colleagues in the Southern District of New York, he also takes no position on this request. Officer Long did indicate that he has remained in contact with Ms. Kumar throughout her trip, and that Ms. Kumar has provided regular updates on her mother's medical condition.

We also wish to inform the Court that we are working with Ms. Kumar to complete her financial affidavit and intend to provide all supporting documentation to Probation by the end of this week.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

Cc: AUSA Christopher DiMase, Esq.
PTSO Robert Long
PTSO Erin Cunningham

Application granted in part and denied in part. The defendant is directed to return to the United States no later than April 2, 2021

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

March 25, 2021